



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303-8960

MAY 07 2008

Mr. Mark Smith, Chief
Hazardous Waste Management Branch
Environmental Protection Division
Georgia Department of Natural Resources
Floyd Towers East, Room 1154
205 Butler Street, S.E.
Atlanta, Georgia 30334

SUBJ: RCRA Compliance Evaluation Inspection
Ace Pole Company, Inc.
EPA ID Number: EPA ID No: GAD 981 223 852

Dear Mr. Smith:

On April 10, 2008, an oversight Compliance Evaluation Inspection (CEI) was conducted by the United States Environmental Protection Agency (EPA) at the Ace Pole Company, Inc. facility in Waycross, Georgia, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

Enclosed is the CEI report that indicates no violations of RCRA were discovered.

If you have any questions regarding the inspection, please contact Daryl Himes, of my staff, by phone at (404) 562-8614 or by e-mail at Himes.Daryl@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Ney".

Frank Ney, Acting Chief
South Section
RCRA & OPA Enforcement and
Compliance Branch

Enclosure

c: Jim McNamara - EPD

DOCSET NO. 615005

6) Applicable Federal And State Regulations

40 Code of Federal Regulations (CFR) Parts 260 - 270, 273, and 279, Solid Waste Disposal Act Sections 3005 and 3007, (42 US Code - Annotated U.S.C.A. 6925 and 6927) Chapter 391-3-11 of the Georgia Hazardous Waste Management Act and Georgia EPD

7) Purpose of Inspection

To conduct an unannounced Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) to determine the facility's compliance with the applicable regulations.

8) Facility Description

Ace Pole Company, Inc. ("Ace Pole", "the facility") operates a wood preserving facility near Waycross/Blackshear, Pierce County, Georgia. Wood products, primarily utility poles are treated with copper chromated arsenate (CCA), per customer requests. The facility has been in operation at this location since 1978. Ace Pole employs approximately 60 employees at the facility which encompasses approximately 100 acres.

Ace Pole is a large quantity generator (LQG) of hazardous waste. Hazardous wastes generated by the facility result from drippage occurring on drip tracks which are characterized as a listed hazardous waste F035 (arsenic, chromium) and a characteristic hazardous waste D004 (arsenic), D007 (chromium). Hazardous wastes are generated from work/storage tank clean-out, cylinder clean-outs, door sump clean-outs, and drip pad cleanups. The facility has three parts washers which use a nonhazardous solvent.

9) Findings

Upon arriving at the facility's main office, credentials were presented and facility personnel were informed of the inspection's purpose. Inspectors then did a walk-through inspection of the facility's hazardous waste generation points and reviewed hazardous waste disposal practice.

Framing Shed

Raw timber is debarked and machined in this area before being placed into a drying kiln in another part of the facility. At the framing shed, ends are cut off the poles, holes are

drilled in the poles per customer requests, and the poles are tagged. No hazardous wastes are generated in the framing shed.

Drying Kiln Area

Ace Pole currently uses three gas-fired drying kilns. Green poles are dried for 72 hours in the kiln. After drying, the poles are sent to a staging area prior to treatment. No hazardous wastes are generated in this area.

Treatment Cylinders/Liquid Collection System

Ace Pole has two treatment cylinders (See Photos 1, 2 & 4), each 100 ft. long, and 9 ft. in diameter. Each CCA treatment process (charge) takes about three hours. The treatment cylinders are equipped with a concrete sump (See Photos 1 & 2) at the base of their opening to collect preservative falling from the cylinders when they are opened to remove the treated posts. The sump also collects preservative drippage from the drip pads and collects storm water contaminated with drippage during rain events. Rainwater entering the sump from off of the drip pad is transferred to tanks within a tank farm which is discussed below.

During the inspection, a metal bin with dimensions of approximately 2 ft x 2 ft x 2 ft (See Photo 2) was observed within the concrete sump at the base of the treatment cylinders. The metal bin was labeled with the words "Hazardous Waste" and is used by the facility to collect wood chips and debris which are contaminated with treatment chemicals both from the drip pad and upon the opening of the treatment cylinders.

The tank farm, discussed above, which is located adjacent to the treatment cylinder building includes eleven tanks used to store both makeup water and process chemicals used by the facility. The tanks are located on a concrete base within a concrete berm capable of holding the volume of the largest tank within the tank farm.

Drip Pad

The dimension of the concrete drip pad is 200' x 28' (See Photos 3&4). The drip pad is sealed with a sealant and not covered by a roof system. According to Ace Pole, the steel-lined CCA drip pad has a leak collection system and the metal pipe conveys any leaked preservative to the sump. At the time of the inspection, the surface of the drip pad was free of any soil or sand. The pad is edged with a solid metal lip to prevent any rainwater from flowing over the edge onto the surrounding ground. At the time of the inspection

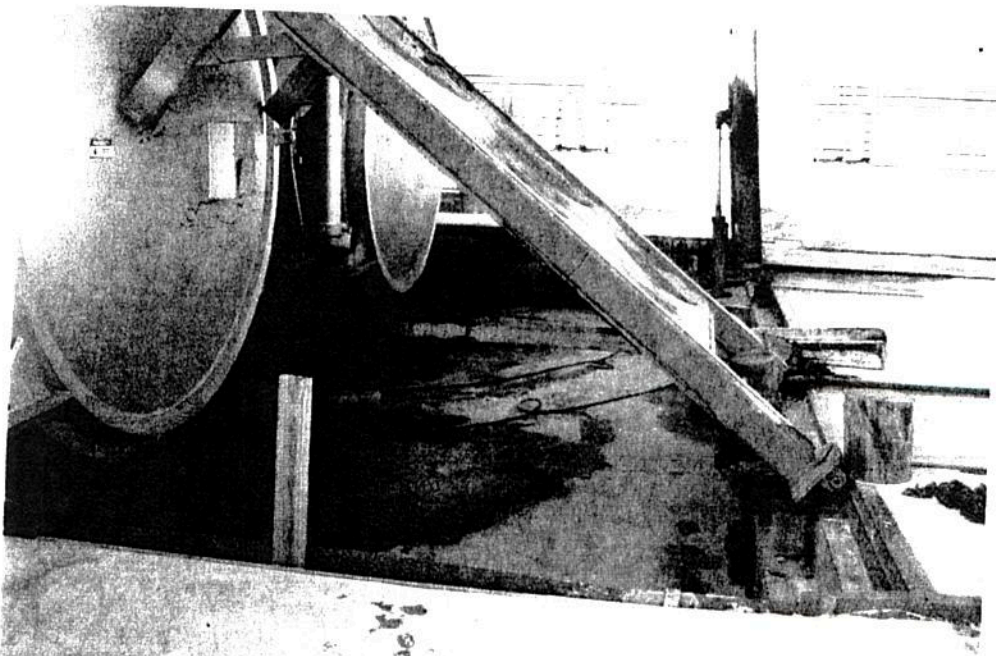


Photo #1 – Sump at base of drip pad.

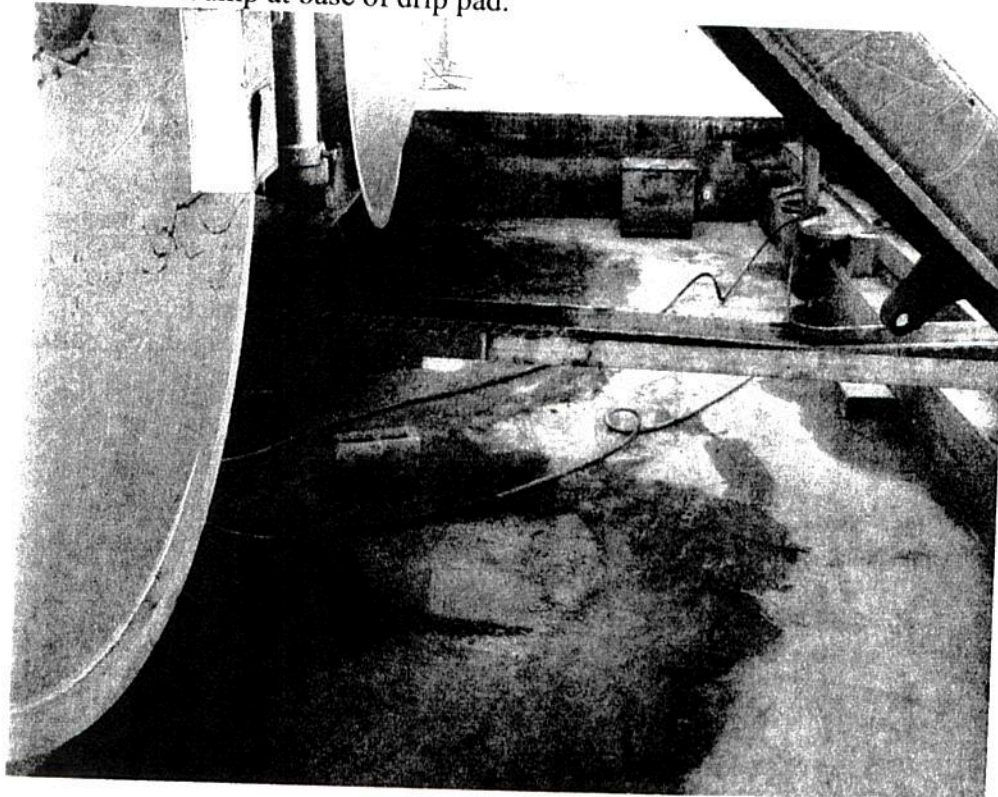


Photo #2 – Sump at base of drip pad.

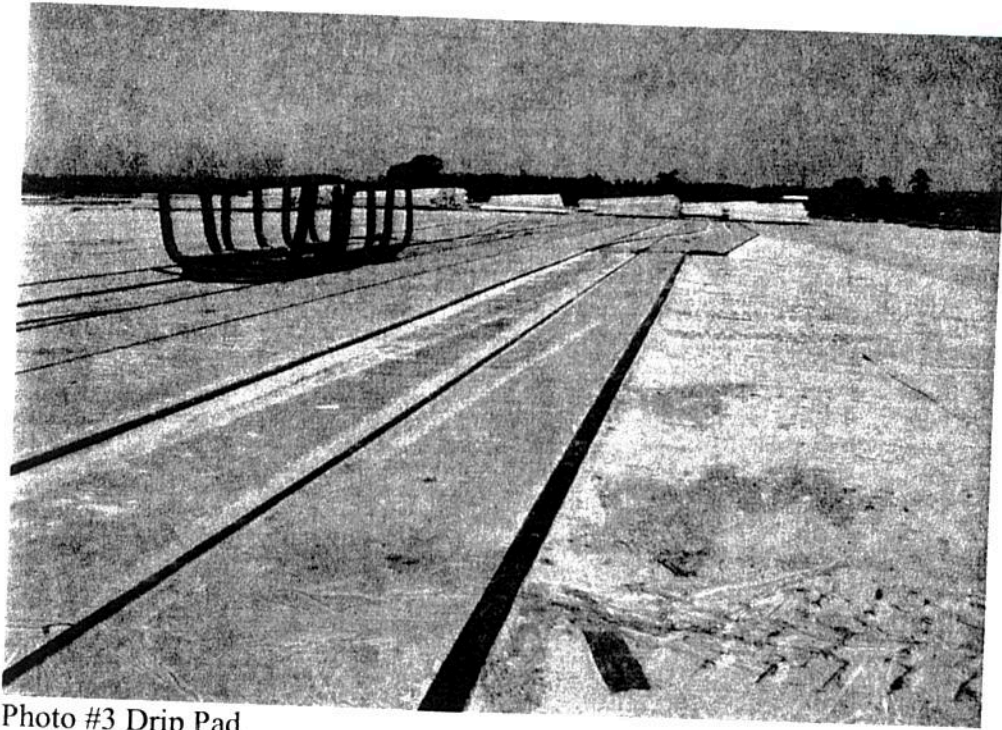


Photo #3 Drip Pad

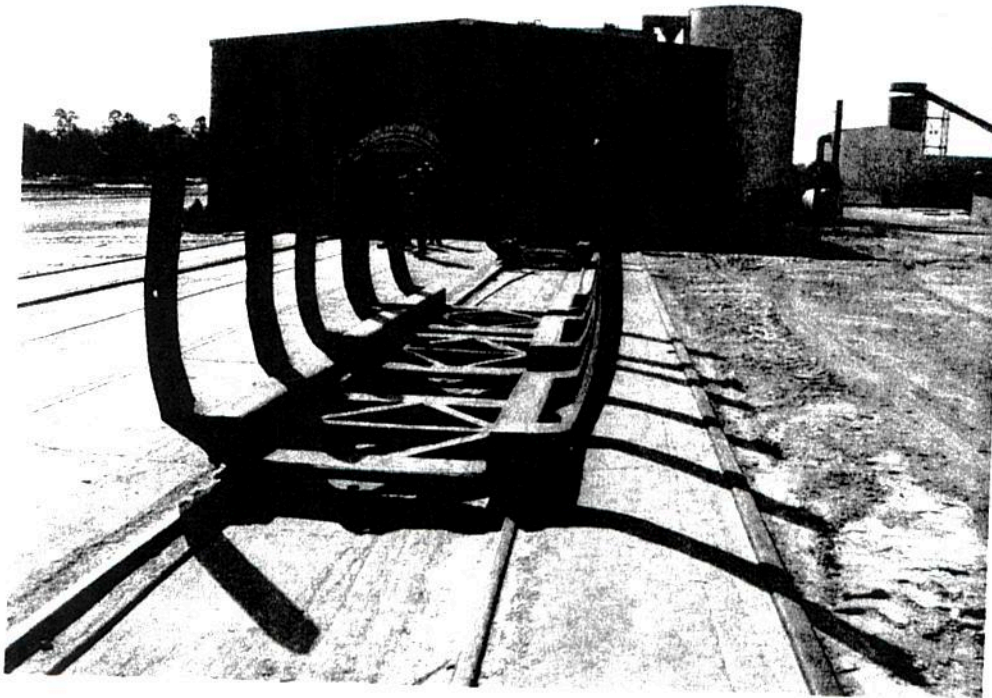


Photo #4 - Drip Pad (foreground) Treatment Building and Tank Farm in Background.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

July 26, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-RCRA&FFB

Mr. C. M. Eunice, Jr.
Ace Pole Company, Inc.
P.O. Box 1323
Waycross, Georgia 31502

RE: Resource Conservation and Recovery Act (RCRA)
Compliance Dates for Wood Preserving Listings

Dear Mr. Eunice:

On December 6, 1990, the U.S. Environmental Protection Agency (EPA) promulgated a final rule that lists wastes from wood preserving processes as hazardous, making the management of these wastes subject to regulation under Subtitle C of RCRA. This rule, published in the Federal Register on December 6, 1991, at page 50450 (see enclosures), lists as hazardous three categories of wastes from wood preserving facilities that use chlorophenolic, creosote and/or inorganic (arsenical and chromium) preservatives. The listings include wastewaters, process residuals, preservative drippage, and spent preservatives from wood preserving processes. The rule also establishes standards for management of these hazardous wastes on drip pads and establishes construction and design standards for these pads. The effective date of this rule was June 6, 1991.

An administrative stay effective on June 5, 1991, and published in the Federal Register on July 13, 1991, at page 27332 (see enclosures), conditionally extended the effective date of the drip pad management standards promulgated in the December 6, 1990, final rule. Specifically, the stay provided that activities that would otherwise constitute disposal of the newly listed wastes into the process areas, or onto existing drip pads in these areas, are not covered by the listings during the duration of the stay.

The stay applies only to those facilities that intend to comply with the drip pad management standards and that make a bona fide effort to do so during the stay period. On or before August 6, 1991, wood preserving facilities affected by the stay

must notify EPA of their intent to follow one of the following courses of action: upgrade an existing pad by February 6, 1992; install a new pad by May 6, 1992; operate with an existing pad in compliance with the management standards; or cease operations by August 7, 1991. If these rules are applicable to your facility, such notification should be made to the attention of Mr. David Langston at the above address.

If you fail to make such notification, your facility must cease operation of the drip pad area on or before August 7, 1991. Continued operation of this area without such notification could result in a violation of RCRA and the assessment of penalties.

If you have any questions concerning this matter, please contact Mr. Langston at (404) 347-7603.

Sincerely,

John E. Dickinson, P.E., Chief
Waste Compliance Section
RCRA and Federal Facilities Branch

Enclosures

cc: GA EPD, Atlanta

bc: WES